

FILED US District Court-UT
MAR 17 '21 PM05:56

ANDREA T. MARTINEZ, Acting United States Attorney (#9313)
CARL D. LESUEUR, Assistant United States Attorney (#16087)
Attorneys for the United States of America
Office of the United States Attorney
111 South Main Street, Suite 1800
Salt Lake City, Utah 84111-2176
Telephone: (801) 524-5682
Email: carl.lesueur@usdoj.gov

SEALED

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JORDY JULIAN ALVAREZ,

Defendant.

INDICTMENT

VIOLATIONS:

18 U.S.C. § 875(b) (Extortion through
Interstate Communications, Counts I through
II)

18 U.S.C. § 875(d) (Extortion through
Interstate Communications, Counts III
through VI)

18 U.S.C. §2261A(2) (Cyberstalking, Counts
VII through IX)

The Grand Jury Charges:

At all times relevant to this indictment:

1. Defendant JORDY JULIAN ALVAREZ resided in the Southern District of Texas.

2. Jane Doe, Jane Doe's father, Jane Doe's brother, and Jane Doe's grandmother all resided in the District of Utah.

3. In 2019, ALVAREZ obtained certain compromising images and videos from Jane Doe. Jane Doe provided these images and videos consensually. Later, in or

Case: 2:21-cr-00111
Assigned To : Nielson, Howard C., Jr
Assign. Date : 03/17/2021
Description:

about December 2019, Jane Doe informed ALVAREZ that she no longer wished to provide images or videos to him.

4. After Jane Doe stopped providing images or videos to ALVAREZ, and in order to extort her into producing and providing an additional explicit video, ALVAREZ pursued a campaign of relentless harassment and intimidation of Jane Doe. ALVAREZ threatened to release to the public, as well as to her friends, family, and employer, the compromising photos and videos of Jane Doe that were already in his possession. ALVAREZ further threatened to publish information designed to humiliate Jane Doe, and threatened that he would not stop until she provided an additional video.

5. ALVAREZ identified Jane Doe's family members, including her father, brother, and grandmother. ALVAREZ sent Jane Doe's father, brother, and grandmother threatening, intimidating, and harassing communications in order to pressure Jane Doe into sending an additional explicit video.

6. ALVAREZ continued the campaign of threatening, intimidating, and harassing conduct for over a year. He used numerous fictitious social media accounts, email accounts, and anonymized phone numbers in order to send messages, texts, calls, and other communications to Jane Doe and her family. ALVAREZ further created false accounts in which he purported to offer for sale compromising images of Jane Doe.

7. Jane Doe repeatedly requested that ALVAREZ cease contact with her.

8. In furtherance of ALVAREZ's campaign, he committed the following violations.

COUNTS I through II

18 U.S.C. § 875(b)

(Extortion through Interstate Communications)

9. Paragraphs 1 through 8 are incorporated as though repeated and realleged herein.

10. On or about the following dates, in the District of Utah and elsewhere,

JORDY ALVAREZ,

defendant herein, with intent to extort a video from Jane Doe, did transmit in interstate commerce the following communications containing threats to kidnap and injure Jane Doe, all in violation of Section 875(b) of Title 18 of the United States Code, each communication constituting a separate offense:

Count	Date	Addressee	Communication
I	January 24, 2021	Jane Doe	Instagram communication including threat that she should "Count your days [] with your friends and family, you might finally get your wish to see me in person."
II	January 30, 2021	Jane Doe's Brother	text messages to Jane Doe's brother demanding he "put your sister on the phone" and threatening "Domt [sic] get mad or upset when your sistet [sic] ends up missing," and other related conduct.

COUNTS III through VI

18 U.S.C. § 875(d)

(Extortion through Interstate Communications)

11. Paragraphs 1 through 8 are incorporated as though repeated and realleged herein.

12. On or about the following dates, in the District of Utah and elsewhere,

JORDY ALVAREZ,

defendant herein, with intent to extort a video from Jane Doe, did transmit in interstate commerce the following communications containing threats to injure the property and reputation of the following addressees or another person and to accuse the addressees or another person of a crime, all in violation of Section 875(d) of Title 18 of the United States Code, each communication constituting a separate offense:

Count	Date	Addressee	Communication
III	December 20, 2020	Jane Doe	Instagram message to Jane Doe approximately stating as follows: "What you going to do?? Do I really have to start blowing all of your family up?"
IV	December 9, 2020	Jane Doe's Father	Text message approximately stating that everyone "will see your daughter naked . . . She may be laughing rn but she will be crying tears of blood when im done with her."
V	October 9, 2020	Jane Doe's Brother	Facebook messenger communication including explicit photographs of Jane Doe and instructions approximately as follows "tell your sister to call me. She thinks I'm playing this time but I'm really going to send everything out to everyone she knows and her job."

Count	Date	Addressee	Communication
VI	December 20, 2020	Jane Doe	Instagram post that tagged Jane Doe, and approximately stating, "You really think ignoring me is going to help, or get me to disappear eventually lol naw. Your only adding more fuel to what I'm doing. I will do this till you are me are dead, idc if I'm 95 still doing this, I will do this forever until you answer."

COUNTS VII through IX

18 U.S.C. § 2261A(2)
(Cyberstalking)

13. Paragraphs 1 through 8 are incorporated as though repeated and realleged herein.

14. On or about the following dates, in the District of Utah and elsewhere,

JORDY ALVAREZ,

defendant herein, with the intent to harass and intimidate, using an interactive computer service and electronic communication service and electronic communication system of interstate commerce, and a facility of interstate commerce, engaged in a course of conduct that caused and attempted to cause, and would be reasonably expected to cause substantial emotional distress to Jane Doe and her immediate family members, all in violation of Section 2261A(2) of Title 18 of the United States Code, targeting a course of conduct at each person constituting a separate offense:

Count	Person targeted	Course of Conduct
VII	Jane Doe's Grandmother	A series of communications to Jane Doe's grandmother including among others text messages stating "I will start sending her stuff to everyone she knows. Family, friends, co workers. I will ruin this little girls life if she doesn't do what I ask for. . . I'm not stopping until she answers. I'm going to harass everyone shes [sic] knows until she answers" and other related conduct
VIII	Jane Doe	Approximately hundreds of communications to Jane Doe, including among others emails to Jane Doe approximately stating that he has started a page with videos of her that has generated \$5,000, and that she was the only one who could stop this, and email to Jane Doe approximately stating, "I wont stop harassing your dad or your family till [sic] you answer," "This ain't stopping till you answer. Idgaf about getting off anymore, I just want to show you this shit I got. Quit f[**]ing hiding. B4 I come see you in person and show you I aint broke." Other conduct includes harassing and intimidating messages sent via Facebook Messenger, Instagram, email, and text.
IX	Jane Doe's brother	A series of communications to Jane Doe's brother, including among others text messages to Jane Doe's brother stating that he should "put your sister on the phone" and threatening "Domt [sic] get mad or upset when your sistet [sic] ends up missing," and other related conduct.

NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of any offense violating 18 U.S.C. § 875, the defendant shall forfeit to the United States of

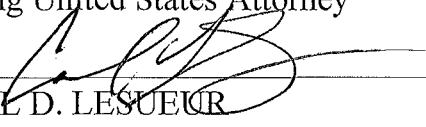
America any property, real or personal, that constitutes, or is derived from, proceeds traceable to the offense.

A TRUE BILL:



FOREPERSON OF GRAND JURY

ANDREA T. MARTINEZ
Acting United States Attorney



CARL D. LESUEUR
Assistant United States Attorney